

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
CAMPBELL,

Plaintiffs,

CIV. 05 2420

-against-

CONSOLIDATED EDISON COMPANY OF NEW YORK;  
STEADMAN PARKING SERVICES, LLC; CONE-HIVES  
PRODUCTIONS, LLC; and ALFRED STEADMAN

Defendants.  
-----X

ANSWER **FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ JUN 15 2005 ★  
BROOKLYN OFFICE

**PLEASE TAKE NOTICE** that the undersigned attorney hereby appears in this proceeding on behalf of the defendants STEADMAN PARKING SERVICES, LLC., CONE-HIVES PRODUCTIONS, LLC, and ALFRED STEADMAN, and demands that all papers be served upon the undersigned at the address hereinafter set forth.

**PLEASE TAKE FURTHER NOTICE** that the defendants,, answering the Plaintiff's Complaint herein, responds upon information and belief as follows:

1. Denies any knowledge or information sufficient to form a belief as to any of the allegations contained in paragraphs numbered "2" and "5" of the complaint.
2. Denies each and every allegation contained in the paragraphs of the Complaint numbered, "1", "3", "4", "6", "7", "8", "9", "10", "11", "12" and "13" inclusive, of the complaint and respectfully refers all questions of law to the Court for determination.

AS AND FOR A FIRST CLAIM FOR RELIEF

3. As to Paragraph "14" of the Complaint, Defendant repeats, reiterates and realleges each and every denial contained in the answer to the complaint as if fully set forth herein.

4. Denies each and every allegation contained in the paragraphs of the Complaint numbered, "15" through and including "19", inclusive, of the complaint and respectfully refers all questions of law to the Court for determination.

AS AND FOR A SECOND CLAIM FOR RELIEF

5. As to Paragraph "20" of the Complaint, Defendant repeats, reiterates and realleges each and every denial contained in the answer to the complaint as if fully set forth herein.

6. Denies each and every allegation contained in the paragraphs of the Complaint numbered, "21" through and including "23", inclusive, of the complaint and respectfully refers all questions of law to the Court for determination.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

7. Plaintiff's lawsuit is in retaliation for being arrested for threatening and attacking Defendant ALFRED STEADMAN with a knife, and for being terminated by Defendants as an employee for cause upon said altercation and continuing threats.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

8. Lack of personal jurisdiction.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

9. Defendant ALFRED STEADMAN is a managing member of Defendant STEADMAN PARKING SERVICES, LLC. Plaintiff fails to set forth any basis for personal liability of Defendant ALFRED STEADMAN.

**WHEREFORE**, this answering Defendants demands judgment dismissing the complaint in its entirety together with attorney's fees, costs and disbursements incurred

by the answering Defendants in this proceeding, and for such other and further relief as this Honorable Court deems just, proper and equitable.

Dated: Briarwood, New York  
June 14, 2005

Yours, etc.,

A handwritten signature in black ink, appearing to read 'Bradley Zelenitz', written over a horizontal line.

BRADLEY ZELENTZ, ESQ. (BMZ-4104)  
GILDIN, ZELENTZ & SHAPIRO, P.C.  
Attorneys for Defendants  
STEADMAN PARKING SERVICES, LLC.  
CONE-HIVES PRODUCTIONS, LLC.  
ALFRED STEADMAN  
138-44 Queens Boulevard  
Briarwood, New York 11435  
(718) 523-1111

# **AFFIRMATION OF SERVICE**

State of New York }  
County of Queens }ss:

BRADLEY M. ZELENITZ, ESQ., an attorney duly admitted to practice law before the Courts of the State of New York, hereby affirms the following under the penalties of perjury

I am not a party to this action, I am over 18 years of age and I reside at Kings County, New York.

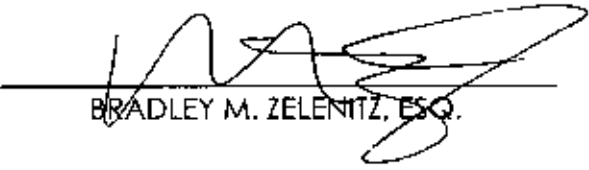
On June 14, 2005 I served a true copy of the annexed

## **ANSWER**

by mailing the same in a sealed envelope with postage prepaid thereon, in an official depository of the USPS within the State of New York, addressed to the last known addressees as indicated below:

David Abrams  
Attorney for Plaintiff Campell  
305 Broadway, Ninth Floor  
New York, NY 10007

Consolidated Edison Company of New York  
Defendant  
4 Irving Place  
New York, NY 10003

  
BRADLEY M. ZELENITZ, ESQ.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
CAMPELL,

Plaintiff,

Index Number:  
CIV. 05 2420

-against-

CONSOLIDATED EDISON COMPANY OF NEW YORK;  
STEADMAN PARKING SERVICES, LLC; CONE-HIVES  
PRODUCTIONS, LLC; and ALFRED STEADMAN,

Defendants.  
-----X

---

**ANSWER**

---

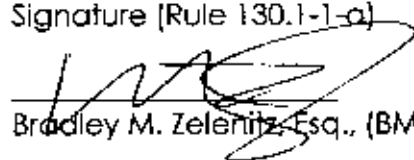
**GILDIN, ZELENITZ & SHAPIRO, P.C.  
BY: BRADLEY M. ZELENITZ, ESQ.  
Attorneys for Defendants  
STEADMAN PARKING SERVICES, LLC, CONE-HIVES PRODUCTIONS, LLC.  
and ALFRED STEADMAN  
138-44 Queens Boulevard, 2<sup>nd</sup> Fl.  
Briarwood, New York 11435  
(718) 523-1111**

---

Service of a copy of the within is hereby admitted:

Dated: June 14, 2005

Signature [Rule 130.1-1-a]

  
Bradley M. Zelenitz, Esq., (BMZ-4104)

---

**PLEASE TAKE NOTICE:**

\_\_\_ NOTICE OF ENTRY

That the within is a true copy of an \_\_\_ duly entered in the office of the clerk within named court on

\_\_\_ NOTICE OF SETTLEMENT

That an order \_\_\_ of which the within is a true copy will be presented for settlement to the HON. \_\_\_ one of the judges of the within named Court, at on \_\_\_ 2005 at \_\_\_ m  
Dated:

Yours, etc.

**GILDIN, ZELENITZ & SHAPIRO, P.C.**